

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

State of Minnesota, by Michael Campion,
its Commissioner of Public Safety,

Plaintiff,

Court File No. 0:08-cv-00603-DWF-AJB

v

CMI of Kentucky, Inc.,
A Kentucky Corporation,

Defendant,

**MOTION FOR ORDER GRANTING
ACCESS TO MATERIALS
NECESSARY TO PERFORM A
MEANINGFUL SOURCE CODE
REVIEW**

and

Minnesota Society for Criminal Justice on
behalf of those Authorized Minnesota
Litigants within the Source Code
Coalition.

TO: TO THE UNITED STATES DISTRICT COURT FOR THE DISTRICT
OF MINNESOTA, PLAINTIFF STATE OF MINNESOTA AND ITS
ATTORNEYS AND DEFENDANT AND ITS ATTORNEYS:

PLEASE TAKE NOTICE THAT AT A TIME TO BE DETERMINED BY
THE COURT: The Minnesota Society for Criminal Justice, on behalf of those
Authorized Minnesota Litigants within the Source Code Coalition, will move the
Court, pursuant to Minn. R. Fed. Proc. 7 and to paragraph 1(c) of the Permanent
Injunction filed in the above captioned matter on July 16, 2009, for an Order
granting access to all materials necessary to perform a meaningful source code
review including the following relief:

1. CMI of Kentucky, Inc. shall disclose all materials set forth in the Attachment to the Affidavit of Mark Lanterman, marked as Exhibit 2-b.
2. The State of Minnesota shall also disclose all materials listed in the Attachment to the Affidavit of Mark Lanterman, marked as Exhibit 2-b, to the extent that said materials are within its possession or control.
3. CMI of Kentucky, Inc. shall pay reasonable costs and attorney fees to the Source Code Coalition within thirty (30) days of the date of this Order.

Said Motion is based upon the attached Memorandum of Law, Affidavit of Mark Lanterman, all attached Exhibits, and all of the files, records and proceedings herein.

RAMSAY LAW FIRM, P.L.L.C.

Dated: February 19, 2010

/s/ Charles A. Ramsay

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651-604-0000

Dated: February 19, 2010

/s/ Daniel J. Koewler

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Attorneys for Source Code Coalition